

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

BETTY’S BEST, INC.,
Plaintiff,

v.

THE INDIVIDUALS, PARTNERSHIPS,
AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON
SCHEDULE “A,”
Defendants

Case No. 1:23-cv-22322-KMW

DECLARATION OF KATHERINE BURGHARDT KRAMER

I, Katherine Burghardt Kramer, declare as follows:

1. I am over the age of 18. I am counsel of record for certain defendants in this action. I have personal knowledge of the matters herein, and if called as a witness could and would testify competently thereto.

2. The certain defendants I represent in this action have retained a private investigator to determine whether certain purchases of products purportedly made in Florida were from actual consumers or were test purchases completed by the Plaintiff and/or its agents in this matter.

From a preliminary review, it appears that at least several of the purchases purportedly made in Florida were test purchases. While investigation is ongoing and the burden is on Plaintiff to establish jurisdiction, numerous of the purported Florida purchases appear to have been sold to the same non-residential address at 1834 Gunn Highway, Odessa, Florida to individuals with likely-fictitious names such as “Tequila Vrebucojy.”

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 16, 2023 at Middlebury, Vermont.

/s/ Katherine Burghardt Kramer
Katherine Burghardt Kramer